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901 - 15TH STREET, N.W.
WASHINGTON, D.C. 20005-2301
(202) 371-6000
FAX: (202) 371-6279

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WRITER'S DIRECT DIAL
(202) 371-6206



November 24, 1997

**BY HAND**

Ms. Magalie Salas
Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

**Re: Comments of Thomson Consumer Electronics, Inc.**
**ET Docket No. 97-206**

Dear Ms Salas:

Enclosed for filing please find the original and nine (9) copies of the Comments of Thomson Consumer Electronics, Inc. in the above-referenced docket.

Please stamp and return to this office with the courier the enclosed extra copy of this filing designated for that purpose. Please direct any questions that you may have to the undersigned.

Respectfully submitted,

Lawrence R. Sidman

Lawrence R. Sidman

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Enclosures

HOUSTON, TEXAS
1111 BAGBY, SUITE 4700
HOUSTON, TEXAS 77002
(713) 225-7200
FAX: (713) 752-2199

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AUSTIN, TEXAS 78701
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FAX: (512) 703-6003

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FAX: (703) 749-6027

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**BEFORE THE**
**FEDERAL COMMUNICATIONS COMMISSION**
**WASHINGTON, D.C. 20554**



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| In the Matter of | ) | |
| | ) | |
| Technical Requirements to Enable Blocking of Video Programming based on Program Ratings | ) | ET Docket No. 97-206 |
| | ) | |
| | ) | |
| Implementation of Sections 551(c), (d) and (e) of the Telecommunications Act of 1996 | ) | |

# COMMENTS OF
# THOMSON CONSUMER ELECTRONICS, INC.

David H. Arland
Manager, Public Affairs
Thomson Consumer Electronics, Inc.
P. O. Box 1976, INH-110
Indianapolis, IN 46206-1976

Lawrence R. Sidman, Esq.
Sara W. Morris
Verner, Liipfert, Bernhard,
McPherson & Hand, Chartered
901 15th Street, N.W., Suite 700
Washington, D.C. 20005
(202) 371-6206

Counsel for Thomson Consumer Electronics, Inc.

November 24, 1997

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**COMMENTS OF**
**THOMSON CONSUMER ELECTRONICS, INC.**

## I. Introduction and Summary.

Thomson Consumer Electronics, Inc. ("Thomson") submits these comments in the above-captioned Notice of Proposed Rulemaking ("*NPRM*") to amend Part 15 of the Commission's Rules to require that television receivers of 13" or more be equipped with features that enable viewers to block the display of video programming with a common rating, as required under Section 551(c), (d) and (e) of the Telecommunications Act of 1996 ("the Act").[1/]

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[1/] Pub. L. No. 104-104, 110 Stat. 56 (1996).

Thomson fully supports the Commission's goal of providing parents, as quickly as technically feasible, with the technological tools they require to block video programming they do not want their children to watch. Thomson is committed to aiding the Commission in achieving this goal by designing, manufacturing and bringing to the market as rapidly as practicable receivers equipped with so-called "V-chip" program blocking technology which would operate in a simple and easy to understand fashion in concert with a proposed ratings system for video programming which the Commission deems acceptable.[2/]

To achieve this common objective of speedy introduction of V-chip program blocking capability into the marketplace, two things must happen. First, it is absolutely essential that the Commission formally approve an industry ratings system *and* adopt final technical rules for manufacturers (both for NTSC and DTV receivers) as quickly as possible, preferably no later than January 1998. Without the certainty provided by FCC adoption of a television ratings system *and* the technical standards, manufacturers cannot reasonably begin the task of moving televisions equipped with V-chip program blocking technology off the drawing boards and into American living rooms. Secondly, TV receiver manufacturers, such as Thomson, require a minimum of 18

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[2/] A proposed industry ratings system is presently pending before the Commission. *See Public Notice,* "Commission Seeks Comment on Revised Industry Proposal for Rating Video Programming," CS Docket 97-55, FCC 97-321, issued September 9, 1997.

months from the date of these FCC approvals to design, develop, test and produce V-chip equipped products.

When viewed in the context of these prerequisites, the Commission's proposed timetable for implementation of program blocking capability is simply impossible for manufacturers to meet. If adopted, it would seriously risk, if not decree, the V-chip's failure in the marketplace and its rejection by consumers. To avoid that result, Thomson urges the Commission to delay its proposed implementation schedule by 12 months, *i.e.*, half the product models be equipped with V-chip technology by July 1, 1999, and the balance by July 1, 2000, to give manufacturers sufficient time to develop, test and produce products in a manner that will be most conducive to the V-chip's success. This revised schedule presupposes Commission completion of the TV ratings proceeding and this rulemaking by January 1998.

Additionally, the Commission's proposal that television receivers be required to accommodate multiple ratings systems, while perhaps attractive in the abstract, is not feasible in practical terms. The existence of multiple ratings systems would require complex user interfaces, making parental operation and programming of program blocking technology unacceptably confusing and slowing the delivery of ratings data to receivers. Combined, the user-unfriendliness and diminished performance associated with a multiple ratings approach could undermine broad consumer acceptance and use of program blocking technology. Therefore, the Commission

should not require TV receiver manufacturers to design and develop program blocking capability which accommodates more than one program rating system.

Similarly, the Commission should not require manufacturers to develop V-chip technology capable of adapting to dynamic or changing program ratings. In the analog world, such a requirement would be simply impossible of performance. Program ratings are not downloadable using analog transmission, and a V-chip cannot be reprogrammed once it is installed in a receiver. To accommodate new ratings, the V-chip would have to be redesigned and a new V-chip physically installed to replace the original device. The same result holds true for digital TV ("DTV") receivers. While program ratings are theoretically downloadable under the digital standard currently being considered by the Advanced Television Systems Committee ("ATSC"), the capability to download interfaces needed to display changed ratings and to permit the consumer to block programming on the basis of new ratings simply does not yet exist. It clearly will not be ready for early generation DTV receivers. Moreover, the likely increase in computing power and associated costs makes addition of this capability problematic. At a minimum, any decision regarding a requirement that DTV receivers accommodate changing or future program ratings should be deferred until DTV technology is more mature.

Thomson also urges the Commission not to mandate user interface standards for television receivers. The design of such user interfaces allows for competitive differentiation

among receivers of various manufacturers. In this area, the forces of competition will produce greater choice for consumers in terms of price and features. It is the very archtype of a decision which should be left to marketplace forces. Moreover, the establishment of such standards falls outside the scope of the Commission's authority in this proceeding.

Finally, the Commission should apply the same V-chip rules to digital and analog TV receivers. The one-year extension of the proposed timetable for compliance, the avoidance of multiple or dynamic ratings and the absence of mandated user interface standards should be common for NTSC and DTV. A DTV standard akin to EIA-608, ATSC T3/S8 Document 193, "Program System Information Protocol for Terrestrial Broadcasting and Cable," currently is being balloted by the members of the ATSC, and the proposed rules should contemplate its adoption.

## II. Thomson's Interest in the V-chip Proceeding.

Headquartered in Indianapolis, Indiana, Thomson is a major manufacturer and marketer of color TV receivers, related video hardware, and a full range of consumer electronics products. Best known for its RCA, GE and ProScan brands, Thomson is the market leader in U.S. sales of color TV receivers, VCRs and, most recently, digital set-top receivers. One out of every five consumer electronics products sold in the United States is a Thomson product. Thomson employs more than 7,000 Americans working in four major manufacturing sites with research, sales and distribution facilities across the nation.

Building on its manufacturing and marketing expertise in the color television business, Thomson has also established itself as an industry leader in digital television in the United States. As a member of both the Advanced Television Research Consortium and, later, the digital HDTV "Grand Alliance," Thomson has been heavily involved in the development of digital over-the-air broadcast television technology, and particularly in the design of the DTV transmission standard for terrestrial broadcasting which was adopted by the Commission nearly a year ago.

## III. The Commission Should Delay the Proposed Implementation Date in the NPRM by One Year, Assuming Completion of This Proceeding and the TV Rating System Rulemaking by January 1998.

The Commission has proposed that television manufacturers be required to provide blocking technology in at least half of their product models with a screen size of 13 inches or larger by July 1, 1998, with the remaining models due to be in compliance by July 1, 1999.[3/] The Commission asserts that such a timetable would accommodate the product development cycle of manufacturers and ensure prompt market availability of receivers equipped with blocking technology.[4/] While Thomson shares the Commission's goal of providing consumers with program blocking technology as quickly as possible, the Commission's proposed timetable is physically impossible to meet, given the realities of manufacturers' product development cycle,

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[3/] NPRM at ¶ 15.

[4/] Id.

and the fundamental facts that the TV ratings system and the rules which are the subject of this proceeding have not yet been approved by the FCC.

Approximately 18 months is needed from the time the Commission completes these proceedings to provide manufacturers the time required, albeit on an accelerated basis, to bring to market products that do not compromise technical standards of quality or consumer acceptability. Accordingly, Thomson believes it is reasonable and prudent for the Commission to delay its proposed V-chip implementation dates by one year. The new dates would then become July 1, 1999, for at least half of the product models, and July 1, 2000, for the remaining models. In order to meet these dates, the Commission needs to release its final Report and Order for the program blocking technical requirements -- and approve a program ratings system -- by January 1998. If this deadline is missed, development time will be shortened to less than the minimum 18 months required by manufacturers, placing an undue burden on the development cycle and creating unacceptable risk of failure.

### A. The Commission Cannot Adopt Final Rules for Technical Standards Before It Formally Approves an Industry Ratings System.

As the Commission acknowledges in its NPRM, adoption of an industry ratings system must occur before the Commission adopts final rules implementing the requirements being placed

on manufacturers.[5/] In fact, the existence of a single, FCC-sanctioned and fully operational program ratings system is sine qua non to the final development of television receivers that would be able to block programming based on those ratings and, as such, will directly affect the time it takes for manufacturers to bring the most fully functional, user-friendly V-chip equipped receivers to the market. Without the *certainty* of knowing the precise nature and specifications of the industry ratings system, manufacturers will not be able to fully design and develop user interfaces, the manner in which function-based information is displayed on the screen and controlled by the viewer using a remote control. The user-friendliness and logical operation of a receiver's functions, using these interfaces, are a major selling point for consumers and an important feature of all receivers manufactured by Thomson and will be essential to ensuring public acceptance and ubiquitous use of the V-chip by parents.

### B. Manufacturers Confront a Development Cycle of 18 Months for V-Chip Program Blocking Capability Which Cannot be Compressed Without Jeopardizing the Successful Rollout of This Technology

The development cycle for the V-chip, from the beginning of its initial design phase to the product's appearance on store shelves, is no less than 18 months. This process, which includes several rounds of testing and production -- both of individual elements and integrated

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[5/] NPRM at ¶ 15. The Commission's approval of a single (i.e., not multiple) ratings system also will play a determinative role in Thomson's ability to bring receivers with blocking technology to the market expeditiously, as discussed below.

components, is essential to ensuring that the products consumers purchase are of optimum quality and user friendliness. In the instant case, this process will require as many as nine separate steps:

1. Design and development of integrated circuits for all receivers that do not have the capability to decode VBI line 21, field 2 data;

2. User interface design and development, a process which logically cannot begin before the manufacturer knows the precise nature of the ratings system;

3. Hardware and software system design and development;

4. Construction of typically two generations of laboratory prototypes, so-called "lab builds;"

5. Laboratory testing of each generation of "lab builds;"

6. Factory retooling and construction of two generations of fully designed receivers, so-called "factory builds;"

7. Field testing of the overall "end-to-end" program blocking system;

8. Release of final software for production; and

9. Production.

While it is possible for some of these steps to proceed concurrently, others, particularly those related to testing and production, are dependent, in part, on externalities beyond the control of the manufacturer. For example, in order to determine that receivers equipped with program blocking capability are fully functional in the "real world," broadcasters will first have to be transmitting encoded ratings data with their programming. Field tests utilizing such transmitted

encoded ratings are indispensable to development of an acceptable product. Otherwise, it is possible that television receivers will be developed -- and bought by consumers -- with V-chip program blocking technology that may not work as intended.[6/]

It is important to note that several iterations of lab builds and testing are required for each product, followed by at least two factory builds prior to production. These steps are essential to ensuring that consumers purchase TV receivers that function as they are intended and that will have the longest possible product life. Finally, a 16-week lead time is required to order parts prior to production of any new or redesigned receiver.[7/]

Unlike the production cycle presumed by the NPRM, the process and timetable discussed above reflects Thomson's historically proven regimen for incorporating advanced new features in receivers and ensuring those products are both quality-tested and user-friendly before they appear on the market and in American living rooms. Anything short of that puts consumers at risk of purchasing receivers that will be less than fully functional or overly confusing to operate.

The consumer electronics market, as the Commission is well aware, is one of the most competitive in the world. Consumers demand high quality products. They demand products that

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[6/] Such a problem in fact occurred in the implementation of Closed Captions and Extended Data Services because of the lack of real field 2 data at the time of implementation.

[7/] This includes the integrated circuit that contains the masked ROM software for implementing a program blocking system.

are easy to operate. They demand products that serve them, not vice-versa. Likewise, consumers reject products they find to be of inferior quality, are cumbersome to operate, or that function illogically. The V-chip program blocking capability, while generally embraced by the public in concept, has a long, uphill road to haul before it achieves broad consumer acceptance in practice. Indeed, given the level of debate on television violence generally, the year-long battle over the use of an age- versus content-based ratings system, and the high political profile of the V-chip in the last election, the practical success of the V-chip easily could fall victim to the extremely high, perhaps unrealistically high, expectations that have been placed upon it. The Commission has an obligation to ensure, therefore, that the first generation of sets equipped with V-chip technology meets, or even exceeds, these expectations to the greatest extent possible. If delaying the implementation date until 18 months after completion of the two relevant rulemakings is necessary to accomplish this goal, so be it. In the end, consumers will remember not that they waited a year longer for V-chip program blocking capability, but rather when they got it, they found that it worked well and that it was easy to use.

In light of the public policy importance attached to program blocking capability, Thomson is prepared to work aggressively to incorporate it as quickly as practicable into all of its TV receiver models 13" or greater. The most reasonable approach to introduction of the V-chip feature is to integrate it into the normal cycle for product redesign and refinement. Such an

approach is best calculated to avoid product error and to facilitate the effective marketing of the V-chip. Typically, manufacturers redesign less than half of their product line each year, and new products are introduced in July or August in ample time for the Christmas shopping season. In its NPRM, the Commission already has signaled its acceptance of a phase-in of the V-chip for all covered products over two years, utilizing a July 1 date for compliance. Thomson supports this approach, subject to the 12 month delay discussed above, again assuming that the rulemakings which constitute the foundation for commercial availability of this feature are completed by January 1998.

### C. The New Timetable Suggested By Thomson Is Consistent With Congressional Intent.

In crafting Section 551(e)(2) of the Telecommunications Act, Congress purposely built in a *minimum, flexible* lead time of two years for manufacturers to comply with Act's program blocking requirements.[8/] Rather than set a date certain by which to require manufacturers' compliance with the law, it established a minimum of two years to allow for the activities and actions needed to occur prior to manufacturers' compliance with the V-chip requirement. During this period, three things were to take place. First, broadcasters and other video programming

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[8/] Section 551(e) of the Telecommunications Act of 1996 requires the Commission to make blocking technology rules effective no sooner than two years after enactment of the Act, or February 8, 1998.

distributors were to adopt voluntarily, and the FCC would approve, a system for assigning and transmitting ratings for all programs according to their amount of violence, sexual situations and adult language. At the same time, the FCC, in consultation with manufacturers, would develop technical specifications and rules by which manufacturers would include program blocking technology in their receivers, and set a final effective date by which receivers must be in compliance with those requirements. Finally, manufacturers, guided by the FCC's rules, would implement the requirements and make available to consumers receivers equipped with the program blocking technology.

Had these events unfolded in rapid fire succession immediately following enactment of the Act, manufacturers might have had sufficient time to make the necessary changes to their products to incorporate V-chip technology by July 1, 1998, as proposed by the Commission. But that has not happened. Unfortunately, the process of developing and adopting a ratings system has, through no fault of the Commission, taken far longer than originally had been anticipated. Indeed, twenty-one months after passage of the Act, the industry ratings proposal is still pending before the Commission, awaiting a determination of its acceptability. Obviously, the instant rulemaking proceeding remains open. As discussed above, both of these proceedings must be concluded prior to there being the requisite certainty to commence the 18 month development cycle described above. While Thomson appreciates and shares the Commission's interest in

adhering as closely as possible to Congress's *minimum* timetable for V-chip implementation, it would be unfair, unreasonable and, above all, unwise to attempt to compress 18 months of design, development, testing and manufacturing into a space of less than 6 months.

Such a telescoped timeframe would defy the flexible approach contemplated by Congress. Indeed, had Congress intended its 2-year window to be a *ceiling* and not a floor, it would have provided so expressly, as it did when it passed the Television Decoder Circuitry Act of 1990 ("the Decoder Act"), which imposed requirements for closed captioning analogous to those embodied in Section 551 of the 1996 Telecommunications Act.[9/]

Indeed, the Commission's own timetable implementing the Decoder Act should serve as a model here. In that instance, the Commission acknowledged the need to adopt standards rapidly in order to give manufacturers sufficient time to redesign and build their product lines and, accordingly, adopted final rules implementing those requirements within 6 months of the law's enactment.[10/] As a result, manufacturers had sufficient time (27 months) to bring their sets into

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[9/] Pub. L. 101-431 (1990). In the Decoder Act, Congress adopted a date certain approach whereby manufacturers were required to include closed captioning circuitry in all sets manufactured or imported into the U.S. with screen sizes of 13 inches or larger. It should be further noted that the date certain specified in that Act provided manufacturers with 3 years to comply with its requirements, even without first requiring a separate but crucial threshold initiative and rulemaking such as the adoption and approval of an industry ratings system.

[10/] *Report and Order* FCC 91-119, GEN Docket 91-1, 6 FCC Rcd 2419 at ¶ 19. The Decoder Act was signed into law on October 15, 1990, with an effective date for compliance by manufacturers of July 1, 1993. The Commission adopted its final rules on April 15, 1991.

compliance with the law without major disruption to their production planning or loss of quality and functionality. Even with that reasonable timeframe, which is entirely consistent with the position Thomson is urging here, the rollout of closed captioning was not free of difficulty, caused principally by the lack of available field data sufficiently early in the production cycle.

Were the Commission to accept the suggestion made by Thomson and other consumer electronics manufacturers to extend the proposed timetable for compliance by one year to July 1, 1999, for half the product models and July 1, 2000, for the remainder, it would be fully consistent with the Act's requirements and contemplation. It would give TV receiver manufacturers approximately 18 months from the completion of all prerequisite FCC rulemakings to deliver product to the marketplace. That schedule is aggressive within the context not only of engineering and production requirements but also within the context of the two year minimum set forth in Section 551(e). Again, it presupposes completion of the TV ratings proceeding and this rulemaking by January 1998.

## IV. The FCC's Adoption of A Single Rating System is Critical to the Success of V-Chip Program Blocking Capability.

In proposing to adopt EIA-608 as the industry standard for the analog transmission of program ratings data over line 21 of the Vertical Blanking Interval ("VBI"), the Commission expresses a preference for "an open, flexible approach to the development of industry standards

and regulations that would accommodate the possible development of multiple ratings systems,"[11] and seeks comment on the wisdom of such an approach. While this type of flexibility may be appealing at first blush, a closer examination of the practical problems associated with such an approach compels the conclusion that is ill-advised. The existence of multiple ratings systems would make parental operation and programming of program blocking technology unacceptably confusing and slow the delivery of ratings data to receivers, hampering performance of this feature. Any attempt to design the V-chip to accommodate multiple ratings [12] likely would torpedo broad consumer acceptance and use of the technology.

### A. The Use of Multiple Ratings Systems Would Make a Receiver's Program Blocking Feature Unacceptably Difficult and Confusing to Operate for Consumers.

The use of multiple ratings systems will add considerable complexity to a television receiver's user interface, creating an unacceptable amount of confusion for the consumer and a potentially insurmountable obstacle to the broad acceptance and use of the V-chip. It is by no means clear that parents will be willing to take the time needed to understand and program a

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[11] NPRM at ¶ 10.

[12] As a technical matter, Thomson views the revised proposed industry ratings system (consisting of an age-based rating, plus "V", "S", "L" and "D" descriptors) and that adopted by NBC (consisting only of the age-based rating) as one rating system. As such, Thomson believes its receivers, using the EIA-608 standard, will be able to accommodate both variations without sacrificing cost or user-friendliness.

receiver that is designed to read a single ratings system. Faced with the compounded difficulty of having to navigate among several systems, a technological gauntlet which would try the patience of most consumers, many, if not most parents, may abandon the technology altogether. One need only look to the untold numbers of old VCRs in American living rooms that incessantly blink "12:00" because their users cannot figure out how to program the clock to comprehend the potential seriousness of the problem. In the end, the broader use of a single rating system must outweigh the questionable benefits of having multiple ratings systems. A single ratings system for all terrestrial broadcast and cable programming will provide the simplicity best calculated to ensure the V-chip's success.

### B. Multiple Ratings Systems Will Negatively Affect Television Receiver Performance.

While the EIA-608 standard is technically capable of accommodating multiple ratings systems, there are immutable bandwidth limitations within VBI line 21 field 2 that constrain transmission and display time for the ratings. Utilizing EIA-608 and a single ratings system, it is contemplated that the program ratings data would be repeated approximately every three seconds. If multiple ratings are to be utilized, *i.e.*, more data is transmitted, it will take longer to transmit that data because of the bandwidth limitations in VBI line 21 field 2. For example, instead of the ratings being repeated every three seconds, the repetition rate may slow to 4-6 seconds. One

consequence of such delay might be that several seconds of programming that parents might not want their children to view would not be blocked, a shortcoming attributable directly to any multiple ratings requirement. Such degradation of performance likely would cause consumer dissatisfaction and serve as a barrier to V-chip acceptance and use.

### C. Once a Program Ratings System Is Adopted, Manufacturers Should Not Be Required to Design Receivers to Accommodate Ratings Systems Developed in the Future.

Once adopted, millions of analog televisions will be designed and sold to the public based on the specifications of the FCC-sanctioned industry ratings system. It is critical to the future functionality of those sets that the ratings system remain unchanged thereafter.

A fundamental limitation of V-chip circuitry in an analog television receiver is that it cannot be reprogrammed. There simply is no "retrofitting" mechanism by which program blocking circuitry hardwired in a receiver can be altered or upgraded once it leaves the manufacturer's facility that is either economically feasible for manufacturers or even minimally convenient for consumers. As a result, were modifications to be made to the ratings system, they could not be incorporated into any sets that had already reached the marketplace, rendering these receivers obsolete for the purpose of blocking programming. Thus, although EIA-608 permits the addition of new ratings, the reality is that existing television receivers cannot be modified to accommodate future ratings systems. If the existing rating system is replaced by a new system,

television receivers already in consumers' homes will not be able to decode and display the new ratings. Only new television receivers containing the program blocking capability designed to work with the new program ratings would be able to block programming rated under the new system.

Manufacturers require the certainty that their products are not doomed to obsolescence. Consumers deserve the certainty of knowing the television receiver they purchase with program blocking capability will continue to have that function as long as they own the set. The Commission must take care to ensure that the ratings system it adopts will remain constant for the foreseeable future so that both sets of expectations can be fulfilled.

For these same reasons, manufacturers cannot be required to build sets that are somehow capable of decoding future ratings systems. Just as the Commission acknowledges it cannot adopt formal standards for manufacturers until the industry ratings system has been approved, manufacturers cannot be expected to design and manufacture their receivers to accommodate ratings systems that do not yet exist. Thomson cannot envision a scenario under which a new ratings systems could be introduced in the future without annulling the program blocking capability of sets already on the market and in homes.

### D. Alternatives to Line 21 Program Blocking Should Be Allowed, But Not Required, By the Commission's Rules.

The Commission seeks comment on whether date/time/channel blocking capability would meet the requirements of Section 330(a)(4) and whether that capability should be allowed as an alternative to blocking technology based on line 21.[13/] The Commission also seeks comment on its legal authority to require both line 21 and date/time/channel blocking, and whether such a requirement would be in the public interest.[14/]

Many televisions currently on the market, including Thomson models, provide users the ability to block programming according to the time, date, or channel. Were the Commission to offer this capability as an alternative to a ratings-based blocking system, it would provide consumers with an immediate and cost-effective alternative to program blocking. However, the *Notice*, perhaps unintentionally, characterizes "date/time/channel" blocking as the ability of a television "not to receive a specific program that occurs at a specific time, on a specific date and specific channel."[15/] Unlike program blocking based on date, time or channel, the technology employing all three factors together is patented and would require licensing for use. Were the Commission to look favorably on "date/time/channel" blocking technology as a viable alternative

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[13/] NPRM at ¶ 13.

[14/] Id.

[15/] NPRM at note 25 (Emphasis added).

under Section 330(c)(4), it should avoid the increased costs and difficulty associated with mandating a proprietary approach which would not be subject to relatively simple and routine cross-licensing arrangements.

No matter which of these alternatives the Commission might consider, Section 330(c)(4) does not give it the legal authority to require the use of such a data/time/channel alternative in addition to a ratings-based (i.e., line 21) system. Section 330(c)(4) specifically states:

> As new video technology is developed, the Commission shall take such action as the Commission determines appropriate to ensure that blocking service continues to be available to consumers. If the Commission determines that an alternative blocking technology exists...the Commission shall amend the rules...to require that the apparatus described in such section be equipped with either [a ratings-based blocking technology] or the alternative blocking technology described in this paragraph. [Emphasis added.]

In other words, Congress clearly intended to give manufacturers the choice of selecting one of two (or more) qualified program blocking systems. It did not intend, nor does the statute authorize, the Commission to require manufacturers to build more than one system into their television receivers.

Nor would the public interest be served by such a mandate. Requiring manufacturers to include variations on blocking technology in their television receivers would represent an unfair and unnecessary financial burden on manufacturers, requiring them to devote significant sums not